

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

STATE OF LOUISIANA, STATE OF  
MISSOURI, *et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR.,  
in his official capacity as President of the  
United States, *et al.*,

Defendants.

No. 3:22-cv-01213-TAD-KDM

**PLAINTIFFS' CONSENT MOTION FOR LEAVE TO EXCEED THE PAGE LIMIT  
FOR SUPPLEMENTAL BRIEF IN SUPPORT OF PRELIMINARY INJUNCTION**

Pursuant to the Local Rules of the U.S. District Court for the Western District of Louisiana, Plaintiffs respectfully request the Court's leave to file a 68-page supplemental brief in support of their Motion for Preliminary Injunction. Counsel for Defendants have consented to this request.

In support, Plaintiffs state as follows: Their supplemental brief summarizes and analyzes extensive evidence of federal censorship activities obtained during the Court-authorized expedited preliminary-injunction-related discovery, and it also analyzes complex legal questions surrounding the existence of government action, standing questions, and other issues relevant to the motion for preliminary injunction. An overlength brief is warranted to provide the Court with a thorough and comprehensive discussion of these issues.

Plaintiffs respectfully request leave to file a supplemental brief of 68 pages. Counsel for Defendants have consented to this request. The proposed brief is attached to this Motion.

Dated: March 6, 2023

**ANDREW BAILEY**  
**Attorney General of Missouri**

/s/ Charles F. Capps

Joshua M. Divine, Mo. Bar No. 69875\*

*Solicitor General*

Charles F. Capps, Mo. Bar No. 72734\*

*Deputy Solicitor General*

Todd A. Scott, Mo. Bar No. 56614\*

*Senior Counsel*

Kenneth C. Capps, Mo. Bar No. 70908\*

*Assistant Attorney General*

Missouri Attorney General's Office

Post Office Box 899

Jefferson City, MO 65102

Tel: (573) 751-8870

charles.capps@ago.mo.gov

*Counsel for State of Missouri*

Respectfully submitted,

**JEFFREY M. LANDRY**  
**Attorney General of Louisiana**

/s/ D. John Sauer

Elizabeth B. Murrill (La #20685)

*Solicitor General*

Tracy Short (La #23940)

*Assistant Attorney General*

D. John Sauer (Mo #58721)\*

*Special Assistant Attorney General*

Louisiana Department of Justice

1885 N. Third Street

Baton Rouge, Louisiana

Tel: (225) 326-6766

murrille@ag.louisiana.gov

*Counsel for State of Louisiana*

/s/ Jenin Younes

Jenin Younes \*

John J. Vecchione \*

New Civil Liberties Alliance

1225 19th Street N.W., Suite 450

Washington, DC 20036

Direct: (202) 918-6905

E-mail: jenin.younes@ncla.legal

*Counsel for Plaintiffs Dr. Jayanta*

*Bhattacharya,*

*Dr. Martin Kulldorff, Dr. Aaron Kheriaty,*

*and Jill Hines*

/s/ John C. Burns

John C. Burns

Burns Law Firm

P.O. Box 191250

St. Louis, Missouri 63119

P: 314-329-5040

E-mail: john@burns-law-firm.com

*Counsel for Plaintiff Jim Hoft*

\* admitted *pro hac vice*

**CERTIFICATE OF SERVICE**

I hereby certify that, on March 6, 2023, I caused a true and correct copy of the foregoing to be filed by the Court's electronic filing system, to be served by operation of the Court's electronic filing system on counsel for all parties who have entered in the case.

/s/ D. John Sauer